

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

WEATHERFORD INTERNATIONAL PLC, *et al.*,

Debtors.

)
) Case No. 19-33694 (DRJ)
)
) Chapter 11
)
) (Jointly Administered)
)

GAMCO ASSET MANAGEMENT, INC.’S AMENDED NOTICE OF APPEAL

GAMCO Asset Management, Inc. (“Appellant”) hereby submits this amendment to its prior Notice of Appeal pursuant to 28 U.S.C. § 158(a)(1) and Federal Rule of Bankruptcy Procedure 8003, dated October 31, 2019 (the “Notice of Appeal”)¹ (ECF No. 413).

Part 1: Identification of the Appellant

1. Name of Appellant: GAMCO Asset Management, Inc., on its own behalf and on behalf of a putative class of current and former common shareholders of debtor Weatherford International plc (“Weatherford”).

2. Position of Appellant in Bankruptcy Case: Appellant is a party in interest to the bankruptcy case as a common shareholder of Weatherford.

Part 2: Identification of the Subject of the Appeal

3. Appellant hereby appeals the *Order (I) Approving Debtors’ Disclosure Statement and (II) Confirming Second Amended Joint Prepackaged Plan of Reorganization for Weatherford International PLC and its Affiliate Debtors Under Chapter 11 of the Bankruptcy Code* (ECF No. 343), as and to the extent that the non-debtor, third-party release and injunction in Weatherford’s second amended joint prepackaged plan of reorganization bars litigation claims by current and

¹ Appellant is amending its Notice of Appeal to add the Committee of Unsecured Creditors and Ad Hoc Noteholder Committee as appellees at their request.

former common shareholders of Weatherford in violation of applicable law and due process.

4. The Court entered the order on September 11, 2019.

5. The order is attached hereto as Exhibit A.

6. Appellant hereby also appeals the *Order Regarding Motion to Reconsider* (ECF No. 391), as and to the extent that the non-debtor, third-party release and injunction in Weatherford's second amended joint prepackaged plan of reorganization bars litigation claims by current and former common shareholders of Weatherford in violation of applicable law and due process.

7. The Court entered the order on October 20, 2019.

8. The order is attached hereto as Exhibit B.

Part 3: Identification of the Other Parties to the Appeal

9. The other parties to this appeal are:

Parties

Attorney

Weatherford International plc (Debtor)
2000 St. James Place, Houston, TX 77056

Timothy A. Davidson II
HUNTON ANDREWS KURTH LLP
600 Travis Street, Suite 4200
Houston, TX 77002

Weatherford International Ltd.
2000 St. James Place, Houston, TX 77056

Timothy A. Davidson II
HUNTON ANDREWS KURTH LLP
600 Travis Street, Suite 4200
Houston, TX 77002

Weatherford International, LLC
2000 St. James Place, Houston, TX 77056

Timothy A. Davidson II
HUNTON ANDREWS KURTH LLP
600 Travis Street, Suite 4200
Houston, TX 77002

Committee of Unsecured Creditors

Jason Lee Boland
NORTON ROSE FULBRIGHT US LLP
1301 McKinney, Ste 5100
Houston, TX 77010

Randall C. Weber-Levine
ROPES & GRAY LLP
1211 Avenue of the Americas,
New York, NY 10036

Ad Hoc Noteholder Committee

Abid Qureshi
AKIN GUMP STRAUSS HAUER & FELD LLP
One Bryant Park, Bank of America Tower
New York, NY 10036

Dated: November 27, 2019

Respectfully submitted,

/s/ Andrew J. Entwistle

Andrew J. Entwistle
ENTWISTLE & CAPPUCCI LLP
500 W. 2nd Street, Suite 1900-16
Austin, Texas 78701
Telephone: (512) 710-5960

Joshua K. Porter (*pro hac vice*)
ENTWISTLE & CAPPUCCI LLP
299 Park Avenue, 20th Floor
New York, New York 10171
Telephone: (212) 894-7200

Counsel for GAMCO Asset Management, Inc.

CERTIFICATE OF SERVICE

I certify that on November 27, 2019, I caused a copy of the foregoing document to be served by the Electronic Case Filing System for the United States Bankruptcy Court for the Southern District of Texas.

/s/ Andrew J. Entwistle
Andrew J. Entwistle